

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA

Case No. 2:19-CV-05217-SRB

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C.M., on her own behalf and on behalf of her  
minor child, B.M.; L.G., on her own behalf and  
on behalf of her minor child, B.G.; M.R., on  
her own behalf and on behalf of her minor child,  
J.R.; O.A., on her own behalf and on behalf of  
her minor child, L.A.; and V.C., on her own  
behalf and on behalf of her minor child, G.A.,

Plaintiffs,

v.

UNITED STATES OF AMERICA,

Defendant.

- - - - -  
Job No. CS5287246

AUDIOVISUAL DEPOSITION of M [REDACTED] R [REDACTED]  
[REDACTED], a witness called by counsel for the  
Defendant, taken pursuant to the Federal Rules of Civil  
Procedure before Kristen L. Kelly, MA CSR No. 115893/  
RPR, and Notary Public in and for the Commonwealth of  
Massachusetts, at the Offices of SIRTEX, 300 Unicorn  
Park, 2nd Floor, Woburn, Massachusetts, on Friday,  
July, 8, 2022, commencing at 8:07 AM

1 likes to make things with clay.

2 MR. NAZAROV: I'm sorry. Did I hear you  
3 say clay?

4 THE INTERPRETER: He likes to make  
5 things with clay.

6 MR. NAZAROV: Clay.

7 Q And where does he do that?

8 A At school.

9 Q Does he sell them?

10 A No, he brings them home, and he puts them on  
11 the table.

12 Q Is he very proud of them?

13 A Yes. On the bottom he signs his name.

14 Q Okay. I want to talk a little bit about help  
15 for your headaches and the inability to sleep that  
16 you've described. Since you've been released from  
17 detention have you seen any psychologists or any  
18 psychiatrist?

19 A No.

20 Q Have you seen any doctors that have  
21 prescribed medicine for your headaches?

22 A Um, the female doctor where I went when I was  
23 pregnant, I asked her to prescribe something for my  
24 headaches because they were very bad and then she gave  
25 me Tylenol.

1       that correct?

2           A       Yes.

3           Q       In the United States, okay.

4           A       Yes.

5           Q       Who is Annie?

6           A       I don't remember.

7           Q       Okay. Have you met with any psychologist or  
8       psychiatrist named Annie?

9           A       I believe so. I don't know. I don't  
10       remember.

11          Q       Do you remember when you met with Annie?

12                   MS. REALMUTO: Objection.

13          A       No, I don't remember.

14          Q       So clarify just for me. You have met with  
15       somebody named Annie; you just don't remember?

16          A       I remember the name a little bit, but I don't  
17       remember.

18          Q       What do you remember about Annie?

19          A       Uh, I don't remember.

20          Q       Did your lawyers have you meet with Annie?

21          A       I don't remember.

22          Q       Is there anything you want to tell me about  
23       this case today that I haven't asked?

24                   MS. REALMUTO: Objection.

25          A       Um, when I was in Arizona, the second time I

1 Q Okay. Do you recall that your attorneys set  
2 up an appointment for you to meet with someone?

3 A Yes.

4 Q Could that person have been named Annie?

5 A Yes.

6 MS. REALMUTO: I have no further  
7 questions.

8 MR. NAZAROV: Just a quick redirect.

9 REDIRECT EXAMINATION

10 BY MR. NAZAROV:

11 Q When is your appointment with Annie?

12 MS. REALMUTO: Objection. Work product.  
13 I'm instructing her not to answer. I'm instructing you  
14 not to answer.

15 Q Are you going to follow your attorney's  
16 instructions?

17 A Yes.

18 Q Have you met with Annie before today?

19 MS. REALMUTO: Obstruct -- objection.  
20 I'm instructing her not to answer. Work product.

21 Q Are you going to follow your attorney's  
22 instructions?

23 A Yes.

24 Q Is there anything you can tell me about  
25 Annie?